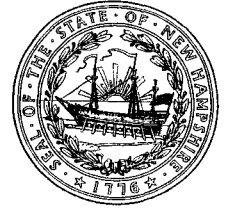




The State of New Hampshire  
**Department of Environmental Services**



Michael P. Nolin  
Commissioner

August 4, 2005

**CERTIFIED MAIL**  
**7000 1670 0001 2915 7301**  
**RETURN RECEIPT REQUESTED**

**LETTER OF DEFICIENCY**  
**No. WMD 05-019**

Sanmina-SCI Corp.  
140 Abby Road  
Manchester, NH 03103-3319

Attn: Jose Carrasquillo, Plant Manager

**Re: Sanmina-SCI Corp.**  
**Manchester, NH**  
**EPA ID # NHD500004163**

Dear Mr. Carrasquillo:

On June 15, 2005, the Department of Environmental Services, Waste Management Division ("DES") conducted an inspection of Sanmina-SCI Corp. ("Sanmina") in Manchester, NH. The purpose of the inspection was to determine Sanmina's compliance status relative to RSA Ch. 147-A and the New Hampshire Hazardous Waste Rules, Env-Wm 100-1100.

As a result of the inspection, the following deficiencies in Sanmina's hazardous waste management program were documented:

1. RSA 147-A:4/Env-Wm 353.04 – Limited Permit

At the time of the inspection, Sanmina was operating a wastewater evaporation unit without a Limited Permit. Waste wash water generated from a stencil washer and a flux/water mixture generated from the wave solder machine, are evaporated in the evaporation unit. The evaporation of these waste waters generates a toxicity characteristic (D008) hazardous waste sludge.

The evaporation unit meets the definition of a hazardous waste treatment facility within RSA 147-A:2, IV because it generates and accumulates a wastewater treatment sludge that is a hazardous waste as defined in Env-Wm 400 (*i.e.*, toxic). DES has no record of receiving a Limited Permit application form from Sanmina for the evaporation unit.

RSA 147-A:4, I requires any person who wishes to operate a hazardous waste treatment facility to first obtain a Limited Permit provided the operator meets the conditions specified in Env-Wm 353.04(b) through (o), including submission of a Limited Permit application form. Initial applications are subject to a \$500.00 fee, as referenced by Env-Wm 353.07(d).

If Sanmina wishes to continue to generate and accumulate a wastewater treatment sludge from the evaporation unit that is a hazardous waste, then DES requests that Sanmina obtain a Limited Permit by complying with the requirements of Env-Wm 353.04(o), which include submitting a New Hampshire Limited Permit application form to DES.

2. Env-Wm 502.01 – Hazardous Waste Determination

At the time of the inspection, no formal waste determinations had been conducted on the flux/water mixture from the wave solder machine, the floor sweepings, the mop water, and the oven filters from the SMT lines.

Env-Wm 502.01 requires that all generators of waste determine if their waste is a hazardous waste. Waste determined to be hazardous must be handled pursuant to the requirements of the Hazardous Waste Rules.

DES requested that Sanmina conduct hazardous waste determinations on the flux/water mixture, the floor sweepings, the mop water, and the oven filters.

*In an email received on June 22, 2005 from Sanmina, David Hager, Manufacturing Engineer Manager, stated that Amro Environmental Laboratories Corporation had taken samples of the flux/water mixture, the floor sweepings and the mop water for analysis.*

*In a Sanmina submittal dated July 1, 2005, David Hager provided the requested hazardous waste determination for the flux/water mixture. The flux/water mixture was determined to be a non-hazardous waste. Sanmina plans to continue to place this waste in its evaporation unit.*

*In a Sanmina submittal dated July 21, 2005, David Hager provided the requested hazardous waste determinations for the floor sweepings and the mop water.*

- (a) *The floor sweepings were determined to be a hazardous waste. The reported total concentration of lead in the floor sweepings is 13 milligrams per liter (mg/L) by the Toxicity Characteristic Leaching Procedure (TCLP). Env-Wm 403.06 specifies that a waste is a characteristic hazardous waste with the waste number of D008, if, using TCLP, the extract of a representative sample of the waste contains lead at a concentration  $\geq 5$  mg/L. The waste floor sweepings may no longer be disposed of as a solid waste, and must be handled pursuant to the requirements of the Hazardous Waste Rules, Env-Wm 100-1100.*
- (b) *The mop water was determined to be a non-hazardous waste and may be discharged to the sewer subject to any requirements of the local sewer system. Sanmina may also place this waste in its evaporation unit.*

**Sanmina still needs to complete its hazardous waste determination on the oven filters from the SMT lines.**

**Additionally, DES requests that Sanmina please provide the following:**

- (i) A written estimate of the quantities of floor sweepings which have been generated since July 15, 2000;**
- (ii) The names of each destination facility that have received the floor sweepings and the relative quantities disposed of at each facility; and**
- (iii) A written estimate of the quantity of floor sweepings that are generated in a week.**

**3. Env-Wm 504.02(d) and Env-Wm 504.02(b)(7)- Generator Notification**

At the time of inspection, according to DES notification records, Sanmina had notified as a Full Quantity Generator (>1000 kilograms/ month). However, a review of waste disposal records indicates that Sanmina's generator status may be that of a Full Quantity Generator (100 - 1000 kilograms/ month).

Env-Wm 504.02(d) requires that a generator shall notify DES verbally or in writing of any changes to the information required in Env-Wm 504.02(b), including generator status, within 30 days of the effective date of the change.

DES requests that Sanmina review its facility hazardous waste generation rates in order to determine its proper generator status; and if necessary, complete and submit a subsequent notification form that accurately reflects the change in generator status.

**4. Env-Wm 507.01(a)(3) and Env-Wm 509.03(d) – Storage Requirements**

At the time of the inspection, one (1) hazardous waste container of lead contaminated waste in the main storage area was not closed. See the attached Container Inventory ("Inventory").

At the time of the inspection, three (3) satellite containers of lead contaminated hazardous waste in the SMT Line area were not closed. See the attached Inventory.

Env-Wm 507.01(a)(3) requires generators to ensure that containers storing hazardous waste be closed at all times, except when waste is being added to or removed from the containers.

DES requested that Sanmina ensure that containers storing hazardous waste remain closed at all times, except when adding waste to or removing waste from the containers.

*In the email received on June 22, 2005 from Sanmina, David Hager stated that the satellite containers of lead contaminated debris and the one drum of lead contaminated debris in the main storage area are now kept closed. No further action is required.*

5. Env-Wm 507.03(a)(1)a. – Container Marking

At the time of the inspection, one (1) box of outdated, ignitable 2-part epoxies, and two (2) 1-gallon containers of ignitable material stored in the main hazardous waste storage area were not marked with beginning accumulation dates. See the attached Inventory.

Env-Wm 507.03(a)(1)a. requires that all containers used for the storage of hazardous waste be marked with the beginning accumulation date at the time they are first used to store hazardous wastes.

DES requested that Sanmina properly mark all containers of hazardous waste with the beginning accumulation date at the time they are first used to store hazardous waste.

*In the email received on June 22, 2005 from Sanmina, David Hager stated that the containers identified above had been shipped off-site on June 21, 2005. No further action is required.*

6. Env-Wm 507.03(a)(1) b., c., and d. - Container Marking

At the time of the inspection, the one (1) box of outdated, ignitable 2-part epoxies, and the two (2) 1-gallon containers of ignitable material stored in the main hazardous waste storage area were not marked with the words “hazardous waste,” words that identify the contents of the container, and the EPA or state waste number. See the attached Inventory.

Env-Wm 507.03(a)(1)b., c., and d. require that all containers used for the storage of hazardous waste be marked with the following information at the time they are first used to store wastes: the words “hazardous waste,” words that identify the contents of the container, and the EPA or state waste number.

DES requested that Sanmina properly mark all containers of hazardous waste at the time they are first used to store waste with: the words “hazardous waste,” words that identify the contents of the container, and the EPA or state waste number.

*In the email received on June 22, 2005 from Sanmina, David Hager stated that the containers identified above had been shipped off-site on June 21, 2005. No further action is required.*

7. Env-Wm 509.02(a)(2) – Personnel Training

A review of Sanmina’s personnel training records revealed that two (2) employees, Russ Webb and Bob Sturgeon, had not received hazardous waste training and/or taken part in annual reviews. Russ Webb was listed as an alternate emergency coordinator in the contingency plan. Bob Sturgeon helps the primary emergency coordinator with hazardous waste duties. In addition to the two employees, janitors from Sanmina’s contracted janitorial service, Neat Cleaning Service, had not received hazardous waste training. The janitors are responsible for emptying the satellite containers of lead contaminated debris and bringing it to the main hazardous waste storage area. The training records also failed to

document a training program which includes a list of hazardous waste job titles, job descriptions, descriptions of introductory and continuing training to be provided for each position, and names of employees filling each position.

Env-Wm 509.02(a)(2), which references 40 CFR 265.16, Personnel Training, requires full quantity generators to maintain a personnel training program. This includes, but is not limited to, ensuring that initial training and annual reviews are conducted for personnel handling hazardous waste, and requires full quantity generators to maintain specific documents and records related to personnel training.

DES requests that Sanmina conduct and document hazardous waste training and annual reviews for all employees who have hazardous waste responsibilities, including the contractors. DES also requests that Sanmina maintain a written personnel training program which provides a description of the type and amount of introductory and continuing training that is given to persons filling each hazardous waste related position, and documentation of hazardous waste job titles, job descriptions, and names of employees filling each position.

8. Env-Wm 509.02(a)(5) – Contingency Plan

A review of Sanmina's contingency plan revealed deficiencies regarding the following:

- (a) Home and office telephone numbers of the emergency coordinators;
- (b) Home addresses of the emergency coordinators;
- (c) A description of primary and alternate evacuation routes;
- (d) A description of the arrangements made with local authorities;
- (e) Instructions for the emergency coordinator to activate internal alarms in the event of an emergency;
- (f) Instructions to notify DES and to include in the notification, the items listed in 40 CFR 265.56(d)(2)(i)-(vi);
- (g) The methods for monitoring facility equipment if there is a work stoppage;
- (h) Procedures for providing treatment, storage or disposal of hazardous waste resulting from an emergency;
- (i) Instructions to ensure that a waste which is incompatible with the released material is not treated, stored or disposed of until cleanup procedures are completed;
- (j) Procedures for providing that all equipment has been cleaned and is fit for use before the resumption of operations;

- (k) Instructions to notify local authorities that the facility is in compliance with 40 CFR 265.56(h)(1) & (2) before resumption of activities; and
- (l) The facility contingency plan did not list specific elements to be included in a 15-day report, listed in 40 CFR 265.56(j), that address details of the incident.

Env-Wm 509.02(a)(5), which references 40 CFR 265, Subpart D, requires full quantity generators to maintain a complete contingency plan at the site.

DES requested that Sanmina revise and update its contingency plan to correct any deficiencies as identified in the Contingency Plan Module given to Sanmina at the time of the inspection.

*In an email received on June 29, 2005 from Sanmina, David Hager provided an updated contingency plan for Sanmina. No further action is required.*

9. Env-Wm 509.02(b) – Emergency Posting

At the time of the inspection, the emergency posting at the nearest telephone to the main hazardous waste storage area failed to document the location of fire extinguishers, spill control material, and alarms.

Env-Wm 509.02(b) requires that full quantity generators post a list of the steps to take if an emergency occurs and the following emergency numbers at the nearest telephone to the hazardous waste storage area:

- (a) The emergency coordinators (home and office);
- (b) The fire department, police department, and State of New Hampshire and local emergency response teams that may be called upon to provide emergency services, unless the facility has a 24-hour response team designated to provide emergency services whose number is posted; and
- (c) The location of fire extinguishers and spill control material, and if present, fire and internal emergency alarms.

DES requested that Sanmina post the required information at the nearest telephone to the hazardous waste storage area.

*In the email received on June 22, 2005 from Sanmina, David Hager stated that the emergency posting had been updated and posted on June 21, 2005. No further action is required.*

10. Env-Wm 509.03(g) - Satellite Accumulation

At the time of the inspection, one (1) 3-gallon satellite storage container of hazardous waste sludge observed near the stencil washer machine was not marked with the words "hazardous waste" and words that identify the contents of the container. See the attached Inventory.

At the time of the inspection, ten (10) satellite containers of lead contaminated hazardous waste in the SMT Line area and the Wave Solder area were not marked with the words "hazardous waste." See the attached Inventory.

Env-Wm 509.03(g) requires that all satellite storage containers used for the storage of hazardous waste be marked with the following information at the time they are first used to store wastes: the words "hazardous waste" and words that identify the contents of the container(s).

DES requested that Sanmina properly mark satellite containers of hazardous waste with the words "hazardous waste" and words that identify the contents of the container.

*In the email received on June 22, 2005 from Sanmina, David Hager stated that the satellite container located near the stencil wash machine had been shipped off-site on June 21, 2005. In an e-mail received on June 30, 2005 from Sanmina, David Hager stated that the satellite containers located in the SMT line area and the Wave Solder Area had been marked with the words "hazardous waste." No further action is required.*

11. Env-Wm 1102.03 and Env-Wm 1112.04 - Universal Waste Lamp Management

At the time of the inspection, the six (6) containers of universal waste lamps were not marked with the words "Universal Waste – Lamps," "Waste Lamp(s)," or "Used Lamp(s)." See the attached Inventory.

Env-Wm 1112.04 requires universal waste handlers of lamps to ensure each universal waste lamp or container(s) holding universal waste lamps to be clearly labeled or marked with any of the following: "Universal Waste – Lamps," "Waste Lamp(s)," or "Used Lamp(s)."

DES requested that Sanmina clearly label or mark universal waste lamps and container(s) holding universal waste lamps with any of the following: "Universal Waste – Lamps," "Waste Lamp(s)," or "Used Lamp(s)."

*In the email received on June 22, 2005 from Sanmina, Dave Hager stated that the universal waste lamp containers are now labeled. No further action is required.*

12. Env-Wm 1102.03(c)(1) – Universal Waste Lamp Management

At the time of the inspection, six (6) containers of universal waste lamps were not closed. See the attached Inventory.

Env-Wm 1102.03(c)(1) requires universal waste containers to be closed, except when universal waste is being added to or removed from the container.

DES requested Sanmina to ensure that all containers of universal waste lamps are closed, except when universal waste is being added to or removed from the container.

*In the email received on June 22, 2005 from Sanmina, David Hager stated that the six (6) containers of universal waste lamps have been closed. No further action is required.*

DES believes the remaining portion of the cited deficiencies can be corrected and a report describing the corrective measures taken by Sanmina can be submitted within thirty (30) days of receipt of this letter. Supporting documentation that describes the measures taken to achieve compliance should be included with the report.

In the event compliance is not achieved within this period, DES may take further action against Sanmina including issuing an order requiring that the deficiencies be corrected, initiating an administrative fine proceeding, and/or referring the matter to the New Hampshire Department of Justice for imposition of civil penalties. In addition, DES personnel may re-inspect your facility at a later date to determine whether the facility has come into, and is maintaining, full compliance with the applicable rules. Fines may be pursued for any or all violations observed during this or subsequent inspections of the facility.

The written report as requested above should be addressed as follows:

Tammy Calligandes, Waste Management Specialist  
DES/WMD  
P.O. Box 95  
Concord, NH 03302-0095

Enclosed you will find a copy of the completed Hazardous Waste Generator Inspection Report which documents the compliance status of your facility at the time of the inspection. This report may also be of value to you for use in determining future compliance with the New Hampshire Hazardous Waste Rules.

The State of New Hampshire Hazardous Waste Rules, as well as much other useful information, can be obtained from DES's website at <http://www.des.state.nh.us/hwcs/>, or by contacting the Public Information Center at (603) 271-2975.

It is the goal of DES to promote the prevention of pollution at the source as the preferred option for meeting established environmental quality goals. We strive to ensure that pollution prevention options are considered first, followed by recycling, treatment and disposal. I am requesting that the DES's Pollution Prevention Coordinator, Stephanie D'Agostino, contact you to discuss possibilities for waste minimization or source reduction at your facility. In the meantime, if you have immediate questions about pollution prevention, please feel free to contact her at 271-6398.



DES

As a service to New Hampshire's hazardous waste generators, we maintain a Hazardous Waste Assistance Hotline which is available for you to contact our knowledgeable staff of hazardous waste inspectors. Our hazardous waste staff is available to answer your questions concerning the New Hampshire Hazardous Waste Rules and the compliance issues which affect your hazardous waste management program. The technical assistance available through the Hotline includes fact sheets that pertain to the management and recycling of specific wastes, summary sheets of specific sections of the Hazardous Waste Rules, copies of EPA and New Hampshire hazardous waste policy or regulatory interpretation letters that may benefit your operation, and networks with other state or federal agencies to answer your questions on a national level. The Hotline is available Monday through Friday, 8:00 AM to 4:00 PM at (1-866) HAZ-WAST (in-state only) or (603) 271-2942.

Should you have any questions regarding this letter, please contact the lead inspector, Tammy Calligandes, or Tod Leedberg, RCRA Compliance Supervisor at 271-2942. Thank you for your cooperation.

Sincerely,

~~COPY~~

John J. Duclos, Administrator  
Hazardous Waste Compliance Bureau  
Waste Management Division

cc: DB/RCRA/LOD/Archives  
Gretchen Hamel, Administrator, DES Legal Unit  
Anthony P. Giunta, P.G., Director, WMD  
Paul L. Heirtzler, P.E., Esq., Administrator, WMD  
Dave Hager, Manufacturing Engineer, Sanmina-SCI Corp.

E-mail: JJD/SD

Enclosure: Hazardous Waste Generator Inspection Report